
From: Hill, Brian [mailto:BHill@milchev.com]

Sent: Thursday, August 12, 2010 4:49 PM

To: Max Wistow; djs@mtlesq.com

Cc: Rochon, Mark; Wise, Andrew; dsherman@eapdlaw.com

Subject: RE: Ungar v. PA

Counsel:

This will confirm the following from today's call:

1. You will be responding separately to our proposal below regarding a schedule for disclosure of witnesses, exhibits and experts.
2. Will will be serving amended responses to Plaintiff's First and Second Requests for Production of Documents and First Set of Interrogatories on Tuesday August 17.
3. The parties will confer by phone at 3:00 p.m. on Tuesday August 17 regarding Plaintiffs' responses to Defendants' First Set of Interrogatories and First Requests for Production of Documents.
4. Defendants proposed to produce a privilege log and any non-privileged documents responsive to Request 1 of Plaintiff's Second Request for Production of Documents and Interrogatory Number 2 in three weeks. You will be responding separately to this proposal.

Please let me know if any of the foregoing is incorrect.

Regards,

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